

# EXHIBIT 4



1           MR. HOFFMAN: And it's also been noticed by  
2 Mr. Summy in the CBE case.

3           MR. SHER: Then you've stated that for the  
4 record.

5 Q     Would you provide your, an overview of your  
6 professional background with Lyondell?

7 A     I -- starting with education or just starting  
8 with Lyondell?

9 Q     Education is a good place to start.

10 A    I have two chemical engineering degrees, a  
11 bachelor's and a master's as well as a master's in  
12 finance. I started my career with ARCO Chemical,  
13 predecessor company of Lyondell, in 1977 and began in  
14 an engineering assignment and then progressed through  
15 a variety of planning business assignments to my  
16 current position.

17 Q    What is your current position?

18 A    Currently I'm a senior vice-president of  
19 intermediate and performance chemicals.

20 Q    What does intermediate and performance chemicals  
21 refer to?

22 A    It refers to a series of chemical product lines  
23 that we manage on a global basis. Products we produce  
24 from basic raw materials. So chemicals such as  
25 propylene oxide, styrene monomer, MTBE, series of

1 performance chemicals that go into coatings, different  
2 applications like that.

3 Q What distinguishes these chemicals for which  
4 you're responsible from other chemicals, if any, that  
5 are produced by Lyondell?

6 A I'm responsible for all the business lines of  
7 Lyondell Chemical.

8 Q How long have you held this position at Lyondell?

9 A Since March of this year.

10 Q Were you with Lyondell before that?

11 A I have been with Lyondell since Lyondell acquired  
12 ARCO Chemical in 1998.

13 Q What were your previous positions with Lyondell  
14 since '98?

15 A Since '98 I had one other position. I was  
16 responsible for urethanes and performance chemicals,  
17 part of which I'm still responsible for today. Part  
18 of that product line was sold in March of this year.

19 Q What was your title in that first position?

20 A Senior vice-president, urethanes and performance  
21 chemicals.

22 Q And were you responsible for chemicals including  
23 MTBE during that time as well?

24 A Not in that assignment.

25 Q So your responsibilities over MTBE at Lyondell